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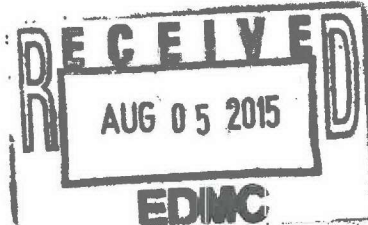


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 3, 2015

15-NWP-149



Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology's Response Comments Regarding Review of the *Clean Closure Practicability Demonstration for the Single-Shell Tanks*, DOE/ORP-2014-02

Reference: Letter 15-NWP-103, dated June 3, 2015, from J. Lyon, Ecology, to K. W. Smith, USDOE-ORP, "Letter 14-ECD-0030, dated July 23, 2014, from K. W. Smith, USDOE-ORP, to J. A. Hedges, Ecology, "Transmittal of Clean Closure Practicability Demonstration for the Single-Shell Tanks DOE/ORP-2014-02"

Dear Mr. Smith:

The Department of Ecology (Ecology) reviewed the *Clean Closure Practicability Demonstration for the Single-Shell Tanks*, DOE/ORP-2014-02 (Practicability Demonstration). Ecology appreciates the opportunity for this review, and we would like to meet with the United States Department of Energy – Office of River Protection to discuss our comments.

The following are some of the items Ecology would like to discuss:

- Further clarification of how the following requirements are being met: the Dangerous Waste Regulations closure performance standards of Washington Administrative Code (WAC) 173-303-610(2)(b) and tank system closure and post-closure care requirements of WAC 173-303-640(8).
- Completeness of the Practicability Demonstration in determining whether a cleanup action uses permanent solutions to the maximum extent practicable from the Model Toxics Control Act Regulation and Statute, WAC 173-340-360(3) (e) and (f).
- A significant risk to human health and the environment is contamination in the groundwater. The Practicability Demonstration does not directly consider the costs for remediating groundwater contamination associated with the Single-Shell Tank (SST) System for either the clean closure or landfill closure alternatives. If the result of the demonstration is that it is not practical to clean close, even without considering groundwater remediation, the demonstration should make this statement.
- In the *Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper*, RPP-46459, Revision 1, the need for coordination and integration of groundwater cleanup activities with SST System cleanup activities is discussed. It is Ecology's expectation that the Tier 1 SST closure plan submittal for September 2015 will further evaluate, describe, and explain how cleanup of groundwater associated with the SST System will be coordinated with overall Hanford site-wide groundwater cleanup.

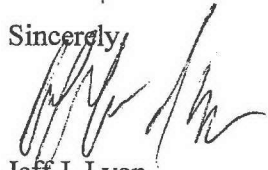
The following section includes areas for future discussion regarding Tier 2 closure planning:

- The Practicability Demonstration did not specifically address the clean closure practicability of any one component, but rather the entire SST System and individual SST Waste Management Areas (WMAs). Component by component evaluations (similar components may be grouped together), are expected for the Tier 2 closure plans though they are not required for the Tier 1 closure plan.
- All SST WMAs have contamination in the deep vadose zone and will have waste residuals after retrievals, which will influence the outcome of all WMA level practicability demonstrations. Regardless of these WMA level influences, it is important that a clean closure impracticability demonstration of any component be included. Ecology does not consider the level of detail contained in the SST System Practicability Demonstration adequate in determining practicability for components of a WMA, and expects a quantitative evaluation of each component be included with each Tier 2 closure plan in compliance with WAC 173-340-360(3) (e) and (f).

As indicated in letter 15-NWP-103 (reference), Ecology expects the submittal of the Practicability Demonstration as part of the permit modification request per Hanford Federal Facility Agreement and Consent Order (HFFACO), Milestone M-045-82 (M-045-82). We anticipate the M-045-82 submittal will be processed with the Tier 1 SST System Closure Plan according to the HFFACO Action Plan, Section 9.2.2, Part B Permit Applications and Closure/Postclosure Plans (Operations and Postclosure).

To schedule a meeting with Ecology, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely,



Jeff J. Lyon
Tank Systems Operations and Closure Project Manager
Nuclear Waste Program

mw/aa

cc electronic:

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